AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Michael Donahue, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit in support of an application for a criminal complaint as to Ronnell **PRATT**.
- I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). I have been so employed since approximately March 2020. From approximately July 2017 until my employment as a Special Agent with ATF, I served as a Task Force Officer with the ATF, while employed as a Police Officer for the Chicago Police Department ("CPD"). I began my tenure as a Chicago Police Officer in November 2012.
- 3. As part of my duties as an ATF Special Agent, I investigate criminal violations relating to criminal enterprises and gangs, including criminal violations of federal firearm laws. I have participated in numerous investigations that involve the illegal purchase, trafficking, possession, and use of firearms and ammunition during, and in relation to, crimes of violence.
- I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation; from discussions with other agents of the ATF and other law enforcement; from my discussions with witnesses involved in the investigation; and from my review of records and reports relating to the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another agent, law enforcement officer or witness who may have had knowledge of that statement and to whom I, or others have spoken or whose

reports I have read and reviewed. Such statements are among many statements made by others and are stated in substance and in part, unless otherwise indicated. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included details of every aspect of the investigation. Facts not set forth herein are not being relied on in reaching my conclusion that the requested complaint should be issued. Nor do I request that this Court rely on any facts not set forth herein in reviewing this application.

Based on the facts set forth in this affidavit, there is probable cause to believe that Ronnell PRATT a/k/a PJ has committed a federal offense, specifically obstructing justice by retaliating against a witness or informant (18 U.S.C. § 1513(e)) ("TARGET OFFENSE"). The elements of the TARGET OFFENSE are that (1) the defendant knowingly and with the intent to retaliate; (2) took an action that was harmful to any person or interfered with the lawful employment or livelihood of any person; (3) for providing to a law enforcement officer; (4) truthful information relating to the commission or possible commission of any Federal offense.

FACTS AND CIRCUMSTANCES

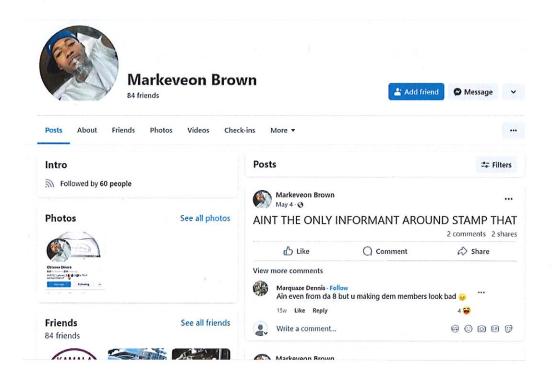
- 6. In or around June 2022, ATF began been investigating individuals that are associated to trafficking firearms out of Mississippi to Chicago, IL. In pertinent part, ATF has been investigating Ronnell PRATT ("PRATT"), known suspect for organizing straw purchasing and trafficking firearms out of Mississippi and into Chicago, IL, along with others.
- 7. On or about, January 18, 2023, investigators presented evidence to a Federal Grand Jury in the Northern District of Mississippi who returned a four (4) count indictment against Jalene YOUNG "YOUNG" for violations of 18 USC 924(a)(1) Making False Statements to a Firearms Dealer under criminal case number 4:23-CR-13. Prior to the indictment, YOUNG had previously admitted to investigators that he purchased firearms for and

at the direction of DERRICK STEWART Jr "STEWART Jr" and PRATT from approximately March 2022 through July 2022. YOUNG plead guilty on August 1, 2023 to the violations, and was sentenced to thirty-one (31) months in the custody of the Federal Bureau of Prisons on October 31, 2023.

- 8. Additionally, on or about, January 18, 2023, investigators presented evidence to a Federal Grand Jury in the Northern District of Mississippi who returned a three (3) count indictment against Markeveon BROWN "BROWN" for violations of 18 USC 924(a)(1) Making False Statements to a Firearms Dealer under criminal case number 4:23-CR-9. Prior to the indictment, Brown had previously admitted to investigators that he purchased firearms for and at the direction of STEWART Jr and PRATT on multiple occasions during the month of July in 2021. Additionally, BROWN admitted he was aware of and present when YOUNG purchased firearms for STEWART Jr and PRATT. BROWN plead guilty to the violations on June 15, 2023, and was sentenced to three (3) years of probation on October 5, 2023.
- 9. On or about August 15, 2023, investigators presented evidence to a Federal Grand Jury in the Northern District of Mississippi who returned a seven (7) count indictment against Jarvis HOOD "HOOD", STEWART Jr, and PRATT for violations of 18 USC 371 Conspiracy; 18 USC 933(a)2 and 3 Trafficking in Firearms; and 18 USC 924(a)(1)(A) Making False Statements to a Firearms Dealer under criminal case number 4:23-CR-116.
- 10. Discovery was produced to each defendant, including PRATT, and contained reports of investigation detailing interviews agents conducted with Brown and other co-conspirators.
- 11. On or about March 19, 2024, STEWART Jr plead guilty to the violations and is currently awaiting sentencing.

- 12. HOOD and PRATT are scheduled to go to trial on October 21, 2024, in Aberdeen, Mississippi before U.S. District Judge Sharion Aycock.
- On or about August 22, 2024, your affiant interviewed BROWN at the Sunflower County District Attorney's office in Indianaola, MS. BROWN informed your affiant that Facebook pages had been created using Brown's name and publicly available photograph. Several posts had been made related to the investigation, purportedly by Brown, and made references to his being a police informant and/or cooperator.
- 14. Brown expressed that he believed individuals he had previously associated with and who were part of the ongoing ATF investigation for federal firearms trafficking violations had created the several fake Facebook profiles. BROWN specifically named Ronnell PRATT as being the suspected perpetrator due to his interpretation of the posts' specifics. BROWN stated he contacted Facebook numerous times to have the Facebook pages removed but he believed some remained.
- 15. BROWN stated the content and existence of the pages made him fearful. He described stress and emotional harm to include the constant feeling in public of having to look over his shoulder at any individual, wondering if physical harm might occur.

 BROWN resides in Humphreys County, Mississippi, within the Northern District of Mississippi.
- 16. While present with BROWN, I reviewed the publicly available profile page with BROWN. He confirmed it was one of the accounts he was referring to and that he did not create the account. Below are screenshots taken from the account that were posted on May 4, 2024:

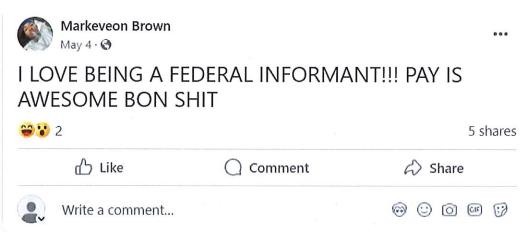














- 17. After viewing the account, your affiant preserved the account through notice to Facebook (Meta Platforms, Inc.). Additionally, I discussed safety procedures with BROWN and advised BROWN to contact investigators with any additional information.
- 18. On September 16, 2024, investigators received a records response from Meta, Inc for subscriber information for the subject Facebook account. The subscriber information listed the account holder as Markeveon Brown and utilized the email address

rodolfo0927@Yahoo.com to activate the account.¹ Additionally, the records provided the account registration date/time as May 4, 2024, at 6:27 UTC, the same date as the posts created that are captured above.

- 19. While reviewing logins for the Facebook account, investigators observed that on May 4, 2024, at 12:09 UTC the account was accessed via IP Address 2601:243:2100:6b0:e952:c581:3868:43df and on May 6, 2024, at 5:01 UTC the account was accessed via IP Address 2601:243:2100:6b0:510:108a:fbc3:eec6. Utilizing a law enforcement database, investigators were able to determine these IP Addresses originated with Comcast. Continuing on September 16, 2024, investigators subpoenaed Comcast for subscriber information related the aforementioned IP Addresses.²
- 20. On or about September 26, 2024, investigators received a response from Comcast for subscriber information for the following IP Addresses:
 - •2601:243:2100:6b0:e952:c581:3868:43df
 - •2601:243:2100:6b0:510:108a:fbc3:eec6

¹ Legal process was served on Yahoo, Inc. The company responded that the associated email of rodolfo0927@Yahoo.com was created on May 3, 2024. The name provided by the registrant was "rodolfo Lechugamorga." A recovery phone number was provided as "+13125503955." Legal process has issued to determine the owner of this phone number but has not yet been received.

² Investigators further determined the following IP addresses accessed the account when it was created and also accessed the account during May 4, 2024, through May 6, 2024: 2600:387:f:6a17::6 and 2600:387:f:761a::5. The IP addresses originated with AT&T, according to a law enforcement database. Legal process was served on AT&T and the company responded with the following: "Individual IP assignments within this block are not stored by AT&T. AT&T does not have individual IP records for the IP in question."

The provided records list the subscriber as "Pratt Ronnell" with an address of 7118 Windsor Ave, Apt 2R, Berwyn, IL 604023248. The type of service provided is "Internet" with an account number of 8771201650773223. The email User IDs associated with the account are RonnellPratt2024@Comcast.net and RONNELLPRATT2023@Comcast.net. The records indicated that the service provided for account number 8771201650773223 began on 3/24/2024 and expired on 5/13/2024.

- 21. Based on my training and experience, I believe that the individual identified through these records is Ronnell PRATT who is the defendant in the indicted cause 4:23-cr-116 based on the trafficking conspiracy.
- 22. In addition, through witness interviews, PRATT has been identified by individuals as a member of the Gangster Disciples. The organization of the Gangster Disciples is a national gang that has a code of conduct for members. Based upon my experience, I know that a primary rule of the organization is a requirement not to "snitch" or provide information to law enforcement.

CONCLUSION

23. Based on the aforementioned facts and circumstances, your Affiant believes that probable cause exists for the arrest of Ronnell PRATT for a violation of Title 18, United States Code, Section 1513(e).

Michael Donahue

Donahue

Respectfully its No binetted, Michael Donahue
Date: 2024.09.27
15:27:31-05'00'

Michael Donahue

Special Agent

Bureau of Alcohol, Tobacco, Firearms, and Explosives

Subscribed and sworn to before me on ________, 2024, via reliable electronic means (telephone) pursuant to Fed. R. Crim. P. 4.1.

THE HONORABLE JANEM. VIRDEN UNITED STATES MAGISTRATE JUDGE